

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

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1. BRUCE ALAN WILMES and )
2. LYN MARIE WILMES, individually )  
and as natural parents and next of )  
kin of L.M.W., a minor )

ME

Plaintiffs,

v.

Case No. CIV 11-1323-D

1. HALLIBURTON ENERGY )  
SERVICES, INC. )
2. HALLIBURTON INDUSTRIAL )  
SERVICES DIVISION and )
3. HALLIBURTON SERVICES, A )  
DIVISION OF HALLIBURTON )  
COMPANY, )

Defendants. )

**NOTICE OF REMOVAL**

1. Halliburton Energy Services, Inc. "HESI" is named as a separate Defendant in a civil action recently brought against them in the District Court of Stephens County, State of Oklahoma, titled Bruce Alan Wilmes and Lyn Marie Wilmes, Individually, and as natural parents and next of kin to L.M.W., a minor, Plaintiffs, v. "Halliburton Energy Services, Inc.", "Halliburton Industrial Services Division", and "Halliburton Services, a Division of Halliburton Company", Defendants, Case No. CJ-2011-261E.

2. At the time of filing the state court action, Plaintiffs were and still are residents and citizens of the State of Oklahoma.

3. Defendant “Halliburton Energy Services, Inc.” was and still is a corporation duly organized under the laws of the State of Delaware, with its principal place of business in the State of Texas. However, separately named Defendants “Halliburton Industrial Services Division” and “Halliburton Services, a Division of Halliburton Company”, were never legal entities and, to the extent either ever did exist, were never citizens of Oklahoma. The parties are thus completely diverse.

4. In their Petition, Plaintiffs claim to be entitled to recover judgment against Defendants in an amount in excess of \$75,000.00, plus and court costs. Therefore, the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs.

5. This is the kind of action of which United States District Courts have original jurisdiction because of diversity of citizenship and sufficiency of amount in controversy. Therefore, pursuant to 28 U.S.C. §1441, *et seq.*, Defendant Halliburton Energy Services, Inc. (“HESI”) hereby removes this action to the United States District Court for the Western District of Oklahoma.

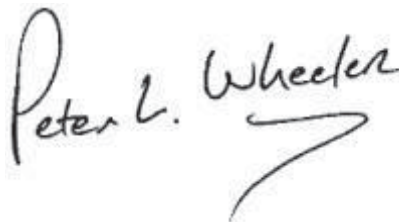
6. The underlying state court action was commenced on October 31, 2011. This notice of removal is therefore timely filed within thirty (30) days after receipt by HESI, “through service or otherwise ...”, of the Plaintiffs’ state court Petition. 28 U.S.C. §1446(b).

7. Copies of all process, pleadings, and orders filed or served upon or received by HESI in the state court action are attached hereto as Exhibit 1. A copy of the state court docket sheet dated November 7, 2011 is attached as Exhibit 2 as maintained by the Oklahoma State Courts Network.

8. Written notice of the filing of this Notice of Removal will be given promptly to Plaintiffs, and Notice of the filing of this Notice of Removal will be promptly filed with the Clerk of the District Court of Stephens County, State of Oklahoma, as provided by 28 U.S.C. §1446(d).

WHEREFORE, the Defendant, Halliburton Energy Services, Inc., removes this action to this Court, invoking this Court’s jurisdiction.

DATED November 7, 2011.

A handwritten signature in black ink that reads "Peter L. Wheeler". The signature is written in a cursive style with a large, sweeping flourish at the end.

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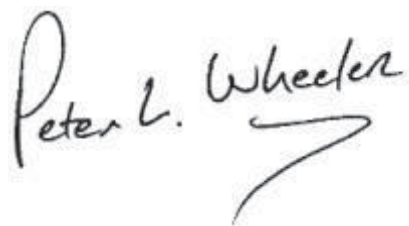
-And-

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**CERTIFICATE OF SERVICE**

This is to certify that on November 7, 2011, a true and correct copy of the above and foregoing Notice of Removal was mailed, with postage thereon fully prepaid, to the following counsel of record:

Bruce Alan Wilmes  
Lyn Marie Wilmes  
311 W. Osage Road  
Duncan, OK 73533  
Pro se

A handwritten signature in black ink that reads "Peter L. Wheeler". The signature is written in a cursive style with a large initial "P" and a stylized flourish at the end.